

## **REMARKS**

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of March 11, 2004.

All of the Examiner's objections and rejections are traversed.

Reexamination and reconsideration are respectfully requested.

### **The Office Action**

Claims 1 and 8 stand rejected under 35 U.S.C. §102(e) as being anticipated by Constanza et al (US 5,900,901).

Claim 10 stands rejected under 35 U.S.C. §102(b) as being anticipated by Lin et al (US 5,659,399).

Claims 2-7 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Costanza in view of Lin.

Claims 11-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lin in view of Thompson et al (5,623,714).

### **Summary of the Amendments to the Claims**

Claim 1 has been amended.

Claim 2 has been placed in independent format and claims 5-7 have been amended to depend therefrom.

Claims 10-12 have been cancelled without prejudice or disclaimer of the subject matter contained therein.

Claims 13 and 14 have both been placed in independent format, and claim 15 has been amended to depend from claim 13.

### **Comments/Argument**

Claim 1 as amended calls for a particular exposure of the photoreceptor by the LED bar "including: a first exposure at a first intensity level, a second exposure at a second intensity level greater than the first intensity level, a third exposure at a third intensity level less than the first intensity level, and fourth exposure at a fourth intensity level less than the third intensity level." None of the references cited in the Office Action expressly discloses or fairly suggests 1<sup>st</sup> through 4<sup>th</sup> consecutive exposures at the relative levels claims. Accordingly it is submitted that claim 1 is now in condition for allowance.

Claim 2 as amended calls for the determined image characteristic to include one of a boundary or a corner. Neither of the applied references, Costanza nor Lin, expressly discloses or fairly suggests that their respective approaches are applicable to these image characteristics. In fact, Applicant can find nowhere, in either reference, where these image structures are even mentioned. Should the Examiner find otherwise, Applicant respectfully requests that the Examiner identify the exact location of such teachings by column and line number. Absent any such teaching, it is submitted that claim 2, along with claims 3-7 that depend therefrom, are now in condition for allowance.

As to claim 8, Applicant respectfully notes that the Examiner has provided no detailed reasoning as to how it is anticipated by Constanze. That is to say, the Office Action is seeming incomplete. See, e.g., the top of page 3. Accordingly, Applicant is without sufficient explanation of the Examiner's position to rebut the same or amend the claim accordingly. It is the Examiner's obligation to present a *prima facie* case for anticipation. Absent a *prima facie* case for anticipation, Applicant submits that claim 8, along with claim 9 that depends therefrom, are in condition for allowance. Should the Examiner hold otherwise, it respectfully submitted that any subsequent Office Action should not be made final inasmuch as the present Office Action does not completely address all the merits of this case.

Claims 10-12 have been cancelled. Accordingly, any objections thereto or rejections thereof are now moot.

Claim 13 as amended calls for "parsing an input data sequence representative of the digital image until a determined condition is encountered, the determined condition including a boundary offset in a process direction; and assigning a varied exposure value to a datum in the input sequence based on adjacency to the determined condition, said assigning including: assigning a value representative of increased electrostatic exposure relative to a reference value to a first datum in the input sequence at a position in the boundary; and assigning a value representative of decreased electrostatic exposure relative to a reference value to a datum in the input sequence adjacent to the first datum."

Neither Lin nor Thompson disclose parsing an input data sequence to detect a boundary. More importantly, neither disclose the particular assigning of values to datum such that a first exposure is above a reference value while a second

neighboring exposure value is below the reference value. Accordingly, claim 13 and claim 15 that depends therefrom distinguish patentably over the references.

Claim 14 as amended calls for "parsing an input data sequence representative of the digital image until a determined condition is encountered, where the determined condition includes a corner." Again, neither Lin nor Thompson disclose parsing an input data sequence to detect the particular claim condition, in this case, a corner. Accordingly, claim 14 distinguishes patentably over the references.

### **CONCLUSION**

For the reasons detailed above, it is respectfully submitted all claims remaining in the application are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

No additional fee is believed to be required for this Amendment A. However, the undersigned attorney of record hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Deposit Account No. 24-0037.

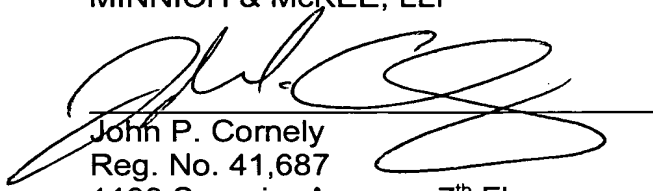
In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call the below signed, at telephone number listed.

Respectfully submitted,

FAY, SHARPE, FAGAN,  
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June 14, 2004

Date

  
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